

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE ROYALTY NETWORK INC.,

Plaintiff,

Case No. 07-CV-3067 (RMB)

v.

COLUMBIA RECORDING CORPORATION,
SONY BMG MUSIC ENTERTAINMENT,
Individually and d/b/a SONY BMG SALES
ENTERPRISE, BEYONCE GISSELLE
KNOWLES, individually and d/b/a B-DAY
PUBLISHING, and EMI APRIL MUSIC, INC.,

**DECLARATION OF
JEREMY MOHR, ESQ.**

ECF CASE

Defendants.
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Jeremy Mohr, Esq., counsel for Beyonce Knowles, hereby declares, under penalty of perjury, that the statements below are based on my personal knowledge and are true and correct:

1. I am an attorney for Beyonce Knowles and I am familiar with the rights she owns and claims in connection with the musical works embodied on the *B'Day Deluxe Edition* album and DVD. Ms. Knowles is not a writer or co-writer of the musical work entitled "Still In Love (Kissing You)." She does not now, and will not at any time hereafter, claim that she is a writer or co-writer of that musical work.

Dated: May 2, 2007
Los Angeles, California



JEREMY MOHR, ESQ.

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE ROYALTY NETWORK INC.,

Plaintiff,

Case No. 07-CV-3067 (RMB)

v.

COLUMBIA RECORDING CORPORATION,
SONY BMG MUSIC ENTERTAINMENT,
Individually and d/b/a SONY BMG SALES
ENTERPRISE, BEYONCE GISSELLE
KNOWLES, individually and d/b/a B-DAY
PUBLISHING, and EMI APRIL MUSIC, INC.,

**DECLARATION OF
ROBERT BRIGGS**

ECF CASE

Defendants.
-----X

Robert Briggs, an employee of EMI April Music, Inc. hereby declares, under penalty of perjury, that the statements below are based on my personal knowledge and are true and correct:

1. I am the Assistant Director of Copyright Administration and Research in the Copyright Department of EMI April Music, Inc. ("EMI"). In that capacity I am one of EMI's custodians of records for copyright documents, including documents relating to EMI's claims of copyright ownership.

2. I have been informed that The Royalty Network, Inc. has alleged that EMI claims rights in a musical work entitled "Still In Love (Kissing You)" recorded by Beyonce Knowles. If EMI did claim ownership of such work, it would be the regular practice of EMI for a memorandum, report, record or data compilation to be made by a person with knowledge of such claim of rights, or to be made from information transmitted by a person with such knowledge, in

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the regular course of EMI's business indicating EMI's claim of rights in such work. Any such memorandum, report, record or data compilation would have been made at or near the relevant time.

3. I have diligently conducted a search of EMI's records relating to copyright ownership and state that there is no record of EMI claiming any rights in or to the musical work "Still In Love (Kissing You)." As such, and based upon representations from counsel for Beyonce Knowles that she is not a writer or co-writer of the subject musical work, and will not at any time hereafter claim that she is a writer or co-writer of the subject musical work, EMI does not claim any rights in or to the musical work "Still In Love (Kissing You)."

Dated: May 2, 2007
New York, New York



ROBERT BRIGGS